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June 16, 1993

Mr. William Bolen
U.S. Environmental Protection Agency
Region V
Waste Management Division
IL/IN Remedial Response Branch HSRL-6J
77 West Jackson Boulevard
Chicago, IL 60604

Re: Waukegan Manufactured Gas and Coke Plant Site
Waukegan, Illinois

Dear Mr. Bolen:

This letter summarizes the conclusions reached during the June 7, 1993 conference call regarding the Illinois Environmental Protection Agency (IEPA) comment letter on the Remedial Investigation/Feasibility Study Phase I Technical Memorandum for the above-referenced site. The participants in the conference call were Tracy Fitzgerald and Jerry Willman of the IEPA, William Bolen from the U.S. EPA, and James Langseth for North Shore Gas. The following items present the topics discussed and conclusions reached:

1. Disposal of Groundwater Produced During Well Development, Sampling, and Pump Test.

   The IEPA has stated that this water will be pollution control waste, regulated under special waste regulations in 35 IAC Subtitle G, Section 809. On that basis, the water could not be discharged except to a publicly owned treatment works (POTW) or under the terms of an NPDES discharge permit. In order to respond to the IEPA requirement, Barr Engineering Company has contacted the North Shore Sanitary District (NSSD) and obtained their concurrence that, in principle, site water can be pretreated and discharged to their system. The PRPs will vigorously pursue obtaining the permit for discharge of these waters to the NSSD. We anticipate that the same pretreatment program envisioned for discharge to the ground surface will be necessary for discharge to the NSSD.

   In the event that IEPA policy allows discharge to the ground as originally proposed, the original program will be followed.

2. Fire Training and Storage of Petroleum and PCBs On-Site by OMC.

More thorough information regarding these matters will be sought for inclusion with the remedial investigation report.

3. Analytical Parameter Reporting.

We agreed that the proposed parameter list in Table 2.4-8 would be satisfactory.

4. Drilling in Highly Contaminated Areas.

a. Borings.

At the request of the IEPA, borings will be grouted with bentonite slurry, rather than neat cement grout. The slurry will be tremied into the borehole.

If we have information on the relative merits of these two approaches, we will provide it to the IEPA and U.S. EPA.

b. Wells.

The only well location considered likely to encounter oil or tar is the MW9S/MW9D pair. As stated on page 71 of the Phase I Technical Memorandum: "If soils in the immediate vicinity of the MW9 well nest are contaminated with oil or tar that appears likely to flow into the well, the MW9 well nest will be deleted from the investigation program." We agreed that this would be a satisfactory program for handling this contingency.

5. Soil Cuttings and Purge Water from Off-Site Installations.

It was agreed that purge water would be transported back to the site and managed as described above (item 1) for all purge water and well development water. All off-site soil cuttings will be brought back to the site and managed as described in item 6 below.

6. Soil Cuttings On-Site.

Soil cuttings which are visibly clean and do not register readings on hand-held air quality screening devices when monitored within 3 inches of the surface of the soil will be left on the ground on-site within the fenced area. Off-site soil cuttings brought back to the site that meet these criteria will also be placed on-site adjacent to other soil cuttings. Soil cuttings not meeting these criteria will be placed in drums for future management.

7. Surface Samples for VOA Analysis.

We agreed that VOA analysis of the 0 to 6-inch surface soil samples is for the purpose of risk assessment and, therefore, would be performed as provided in the Phase I Technical Memorandum. VOA information has already been obtained from the seventeen shallow soil samples (2 to 4-foot depth) collected during the Phase I investigation.

8. Identification of the Soil Stockpile Referred to in Section 3.2.3.1.

The identification of the soil stockpiles is adequately presented in Sections 3.2.3.1 and 3.2.3.2.

9. Wells in Areas with Free-Flowing Contaminants.

This issue was addressed under item 4 above.

10. Sampling Oil or DNAPL from Wells.

Prior to purging well, a probe will be inserted to the full depth of the well and observed for the presence of DNAPL. In the event DNAPL is discovered, an effort will be made to sample the DNAPL if there is sufficient depth of product to make sampling physically feasible. It should be recognized that the water quality data from wells containing DNAPL is likely to be inconsistent over time and not representative of the concentrations of dissolved phase contaminants that might be transported with groundwater.

11. Groundwater Discharge at the Site.

This issue was addressed under item 1 above.

12. PCB Analysis as Referenced under Section 2.4.4.4(1).

As agreed at the March 5, 1993 meeting, samples from new monitoring wells MW11S and MW11D will be analyzed for PCBs (as are all first round samples from the site monitoring wells). If PCBs are reported in the water, this may trigger further investigation of the likely source of those PCBs. Analysis of soil samples for PCBs will be performed on samples from the existing sand stockpile and designated soil stockpile as provided in the Phase I Technical Memorandum.

These agreements cover all of the comments raised by the IEPA in their letter dated May 20, 1993 to Mr. Bolen.

Barr wishes to comment on two matters in the IEPA letter. First, Barr disagrees that the release of 7,400 gallons of water at the site during the Phase I work necessarily caused additional contaminant migration vertically and laterally. The net effect of this discharge was not to add contaminants to the groundwater at the site because the water was first treated to remove contaminants prior to discharge. Second, the IEPA stated that discharge of

water during Phase II would add additional drive water to the aquifer. Since all this water would initially be removed from the aquifer, would be treated, and would be discharged downgradient of the process area, the effect of discharging the water at the proposed location would be to retard the advance of upgradient contaminated water. Thus, the discharge would not result in a net increase in contaminant loading to the harbor.

I expect to send you a copy of the detailed responses to the U.S. EPA's comments with attachments and supplementary information early next week. If the understandings expressed in this letter regarding the conclusions reached during our phone call regarding the IEPA comments are not consistent with your understandings, please so inform me promptly.

Yours truly,

James R. Langseth

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